

**Federal Defenders
OF NEW YORK, INC.**

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March 27, 2019

The Honorable Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

*Application Granted
SO ORDERED
Jon Bloom
3/27/19*

Re: United States v. Simon Gordon, 19-MJ-121 (RML)

Dear Judge Bloom:

I am writing to request a bail modification for Mr. Gordon. Mr. Gordon's bail requires that his travel be limited to New York City and Long Island.

I write, with consent from the Government and no objection from Pretrial Services, to respectfully request that the Court modify Mr. Gordon's travel restrictions to travel to Paramus, New Jersey on March 29, 2019. Mr. Turner applied for a job with Greyhound Lines and has a physical examination in Paramus, New Jersey on March 29, 2019. Mr. Gordon would like permission to travel to Paramus for this employment purpose.

Thank you very much for your consideration of this request.

Respectfully Submitted,

/s/
Ashley M. Burrell
Assistant Federal Defenders
(718) 407-7408

cc: AUSA Turner Buford (via Email)
Pretrial Services Officer Anna Lee (via Email)